



SnappBatt™

Member
TILE ROOFING
INSTITUTE



3749-D #120, Gulf Breeze Parkway
Gulf Breeze, FL 32563
Phone 800-906-0084
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Request for Declaratory Statement on Rule 9B-72

November 19, 2009

Florida Building Commission
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

Dear Sir or Madam,

SnappBatt is a new product we have developed to add airspace into a tile roof system by elevating the tile approximately ½ inch above the underlayment. Our initial release of this product is in the western states, and has been very well received.

Rule 9B-72 State Product Approval is for products comprising the building envelope and structural frame in accordance with the Florida Building Code. It is our understanding from the TRI review (see attached letter), that our product is classified as a shim or accessory and therefore does not fall under Rule 9B-72. It is not a fastener or integral part of the roofing system as it is not required by code and is merely an optional method of providing air space beneath the tile. Standard fastening requirements are the same whether or not our product is used. It can be used in conjunction or interchangeably with other above sheathing ventilation products such as wood battens or foam.

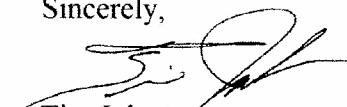
We have tested our product on concrete roof tile with PRI labs in Tampa, Florida in accordance with SSTD-11 using three of the common fasteners with uplift test results exceeding 170 miles per hour as shown in the wind chart on the following page. We have also performed a crush test which supported weight loads in excess of 2200 pounds per 100 square feet (one square).


Since there are no standards for testing a shim, and in order to better educate our end users as to the legal requirements of using our product in the state of Florida, we were looking for a more formal and official written statement to show that there are no requirements for product approval as related to the use of our product.

We respectfully request a declaratory statement with regard to our product and Rule 9B-72.

Thank you for your time and consideration in this matter.

Sincerely,


Tim Johnson
Principal

DCA09-DEC-375
FILING AND ACKNOWLEDGEMENT
FILED, on this date, with the designated
Clerk, receipt of which is hereby
acknowledged.

Paula P. Ford
Commission Clerk

Date
11/20/09

Wind Uplift Test Results

Exposure B

Gable Roof 2 1/2:12 - < 6:12 or Hip Roof 5 1/2:12 < 6:12

<i>Mean Roof Height</i>	85	90	100	105	110	120	125	130	140	145	150	170
0-30	11.2	12.5	15.4	17.0	18.7	22.2	24.1	26.1	30.3	32.5	34.7	44.6
40	12.1	13.6	16.8	18.5	20.3	24.1	26.2	28.3	32.9	35.3	37.7	48.5
50	12.9	14.5	17.9	19.7	21.6	25.7	27.9	30.2	35	37.6	40.2	51.6
60	13.6	15.2	18.8	20.8	22.8	27.1	29.4	31.8	36.9	39.6	42.4	54.4

Importance Factor = 1.00

Exposure B

Hip Roof 2 1/2:12 - 5 1/2:12

<i>Mean Roof Height</i>	85	90	100	105	110	120	125	130	140	145	150	170
0-30	8.4	9.4	11.6	12.8	14.0	16.7	18.1	19.6	22.7	24.4	26.1	33.5
40	9.1	10.2	12.6	13.9	15.2	18.1	19.6	21.3	24.6	26.4	28.3	36.3
50	9.7	10.9	13.4	14.8	16.2	19.3	20.9	22.6	26.3	28.2	30.2	38.7
60	10.2	11.4	14.1	15.6	17.1	20.3	22.1	23.8	27.7	29.7	31.8	40.8

Importance Factor = 1.00

Exposure B

Gable Roof 6:12 - 12:12

<i>Mean Roof Height</i>	85	90	100	105	110	120	125	130	140	145	150	170
0-30	6.8	7.6	9.4	10.4	11.4	13.6	14.7	15.9	18.5	19.8	21.2	27.3
40	7.4	8.3	10.2	11.3	12.4	14.8	16	17.3	20.1	21.5	23.1	29.6
50	7.9	8.8	10.9	12	13.2	15.7	17.1	18.5	21.4	23	24.6	31.6
60	8.3	9.3	11.5	12.7	13.9	16.6	18	19.4	22.5	24.2	25.9	33.2

Importance Factor = 1.00

FL/B Uplift

Nail - Smooth	17.0
Nail - Ring Shank	26.7
L - Screw	38.0



From: Rick Olson, Technical Director

May 27, 2009

TO: Dallas Green
3749-D Ste 120 Gulf Breeze Pkwy
Gulf Breeze, FL 32563

RE: Snapp Batten

As we discussed on the phone, I would classify the Snapp Batten you manufacturer as a spacer for the tile. Since it does not fit any of the properties of a true batten, it would not fall into the requirements of the battens in our industry based Moderate Installation Guide.

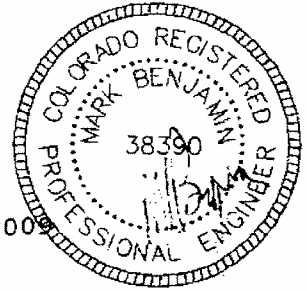
As such it would provide the necessary fastening requirements for our tile and allow for the increased airspace provided by a raised installation.

Sincerely,
Rick Olson
Technical Director



CODE COMPLIANCE REPORT
Job No. SNP1-09088

Date Signed: June 9, 2009



Top Line Manufacturing
3749-D Suite 120 Gulf Breeze Pkwy
Gulf Breeze, Florida 32563

Attention: Dallas Green

Re: SnappBatt tile roofing shims

Dear Mr. Green:

I reviewed the material you provided regarding the SnappBatt tile roofing shim. The test data I reviewed included Laboratory Test Reports from PRI Construction Materials Technologies, LLC, an International Accreditation Service (IAS) certified agency. IAS is a subsidiary of the International Code Council. The testing results were for 3" smooth shank nails (PRI TLM-001-02-01), 3" ring shank nails (PRI TLM-001-02-02) and 3" screws (PRI TLM-001-02-03).

I reviewed the Aerodynamic Uplift Load Charts as published in the Concrete and Clay Roof Tile installation manual (ICC-ES ESR-2015P) and performed wind analysis on a typical residential re-roofing project. Structural analysis criteria includes: building code is 2006 International Residential Code (IRC) as amended by the local building jurisdiction; wind speed is (see below) mph, exposure C; seismic zone B. As an example, at a Mean Roof Height of 30' maximum at exposure C, the following wind speeds should be considered as maximum for the three fastener types:

1. Plain shank #11 - 3" nails: 90 mph for gable, 110 mph for hip and 120 mph for steep gable (over 6:12).
2. Ring shank #11 - 3" nails: 110 mph for gable, 130 mph for hip and 150 mph for steep gable (over 6:12).

Engineered for the way you build ...

... Designed for the way you live.

3. Screw #7 - 3": 140 mph for gable, 150 mph for hip and 170 mph for steep gable (over 6:12).

Consult the above mentioned charts for additional Mean Roof Heights and corresponding wind speeds and exposures.

It is my opinion that the SnappBatt tile roofing shims will properly support the tiles provided they are installed as recommended in the Installation Guide. I agree with the Tile Roofing Institute's (TRI) classification of this product as a shim, as outlined in the memo from TRI Technical Director, Rick Olson, and dated May 27, 2009. I approve of and endorse the use of the installation of this product according to the maximum wind speeds and exposures specified in the Aerodynamic Uplift Load Charts. Please provide all reference materials to building departments at their request.

Thank you for retaining us to perform this structural evaluation service. Please feel free to contact our office if you have any further questions.

Very truly yours,

MARK BENJAMIN, PE, SECB

{Certified in the practice of structural engineering}

Copies: 4